


ORIGINAL

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

DEPUTY CLERK. 

UNITED STATES OF AMERICA

NO.

v.

BOBBY WAYNE PEARCE

**3-19CR-088-B**

INDICTMENT

The Grand Jury Charges:

Count One

Production of Child Pornography  
(Violation of 18 U.S.C. § 2251(a))

From, on or about October 18, 2018 to October 26, 2018, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendant, **Bobby Wayne Pearce**, used, persuaded, induced, and enticed Jane Doe #1, a person under the age of eighteen (18) years, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including the following:

File Name	File Description
1412c880-1c16-458a-ade2-05d1992293ec.jpg	An image depicting JD1, a juvenile female who is 14 years old, performing oral sex on PEARCE's penis.
1540108696302.jpg	An image depicting JD1, a juvenile female who is 14 years old, having sexual intercourse with PEARCE. PEARCE is penetrating JD1's vagina with his penis.
1540108697407.jpg	An image depicting JD1, a juvenile female who is 14 years old, straddling PEARCE while both are fully nude. JD1 is masturbating PEARCE's penis.
095a7300-181f-4318-b4ff-9759b642cfa7.mp4	A video depicting JD1, a juvenile female who is 14 years old, performing oral sex on PEARCE's penis.
8230b4d5-4e8a-4055-9f58-e64d59ecfb59.mp4	A video depicting JD1, a juvenile female who is 14 years old, having sexual intercourse with PEARCE. PEARCE is penetrating JD1's vagina with his penis.
27a832cc-1b44-4dcb-8e2f-7e9a88b3e1fe.mp4	An image depicting JD1, a juvenile female who is 14 years old, straddling PEARCE while both are fully nude. JD1 is masturbating PEARCE's penis.

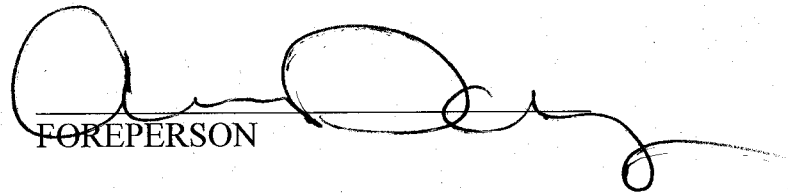
In violation of 18 U.S.C. § 2251(a).

Forfeiture Notice  
(18 U.S.C. § 2253)

Upon conviction of any of the offenses alleged in the indictment and pursuant to 18 U.S.C. § 2253(a), the defendant, **Bobby Wayne Pearce**, shall forfeit to the United States of America (a) any visual depiction described in 18 U.S.C. § § 2252A, and 2252, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in the respective offense; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the respective offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of the respective offense and any property traceable to such property. The above-referenced property subject to forfeiture from the previously-mentioned defendant includes, but is not limited to, any interest in the following:


1. ZTE Cellular Device IMEI number 865356032069775
2. ZTE Cellular Device IMEI number 865356030646475
3. LG Cellular Device IMEI number 352972090699087

A TRUE BILL



FOREPERSON

ERIN NEALY COX  
UNITED STATES ATTORNEY



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v.

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INDICTMENT

18 U.S.C. § 2251(a)  
Production of Child Pornography  
(Count 1)

18 U.S.C. § 2253  
Forfeiture Notice

1 Count

A true bill rendered

DALLAS

FOREPERSON

Filed in open court this 21<sup>st</sup> day of February, 2019.

Defendant in Federal Custody since 2/5/2019 in Fannin Co.

UNITED STATES MAGISTRATE JUDGE  
Magistrate Court Number: 3:19-MJ-090-BT